

COMPLAINT

(for non-prisoner filers without lawyers)

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
CLERK OF COURT

2021 JUL 26 P 11:11

(Full name of plaintiff(s))

Denise Michelle Ward

v.

(Full name of defendant(s))

Lad Lake Inc.

Case Number:

21-cv-0870

(to be supplied by Clerk of Court)

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at
(State)

2634 N. 7th St, Milwaukee, WI 53212

(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Lad Lake Inc.

(Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)
and (if a person) resides at 2635 N. 7th St. Milw, WI 53212
(Address, if known)
and (if the defendant harmed you while doing the defendant's job)
worked for Lad Lake Inc. W350 S1401, Waterville Rd, Dousman, WI 53118
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

On October 5, 2020, Lad Lake Inc. offered me a part-time Supervisor Visitation Worker
position with their company. On October 20, 2020, I received a phone call from Kristin
Butler asking about my physical restrictions. I informed her that my permanent
disability were as my doctor stated. No lifting over 10 pounds, no repetitive motion
with your head, and alternate sitting and standing every 30 minutes during a shift.
I could do the job effectively with support. There are supports that the company could
have put in place but it seems that they refuse to do so in aiding individuals with
disabilities. I am on SSDI, I could have been able to do the work effectively and safely.
Kristin stated that they felt that I could not safely do this job due to my disability
and restrictions.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ _____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I would like for the courts to find that Lad Lake Inc, did discriminate against me after they were informed about my restrictions which allowed them to rescinded their position.

Back pay, forward pay, compensatory damages, punitive damages, attorney fees (if I have to seek representative during this process), changes to the organization, any other relief that the court deem just.

E. JURY DEMAND

I want a jury to hear my case.

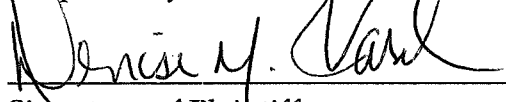
☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 22 day of July 2021.

Respectfully Submitted,


Signature of Plaintiff

Plaintiff's Telephone Number

414.374.7928

Plaintiff's Email Address

warddenise2227@gmail.com

2634 N. 7th ST, Milwaukee, WI 53212

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE



I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.



I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.